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[I-8846]

III. Remarks**A. Summary of Amendments**

Claim 20 has been amended to affirmatively recite that the applying means is coupled to a "bicomponent fiber source containing said bicomponent fibers." A similar feature was previously recited in, for example, claim 38.

Claim 26 has been amended to recite that "the hose is oriented at an upward orientation toward said top wall," as recited in, for example, claims 35 and 42.

Claims 38 has been amended to recite that the source is a "source containing bicomponent fibers."

B. Rejection under 35 U.S.C. §102**1. "Young"**

The Action rejects Claims 20-25, 29-34, 37-41 and 43 as being anticipated by U.S. Patent No. 5,432,000 to Young, Sr. et al. (hereinafter, "Young").

Independent Claim 20 is directed to a system for manufacturing an insulation product. The system includes a conveyor for conveying an insulation sheet (i.e., insulating layer – matt or board) containing randomly oriented fibers bonded together, the sheet having first and second major surfaces and a pair of side portions. The system also includes means for applying a layer of bicomponent fibers to at least one of said major surfaces, each of said bicomponent fibers including first component and second component portions, and a heater disposed to heat said layer and said sheet, thereby forming a nonwoven layer meltbonded to said at least one of said major surfaces.

Amended claim 20 recites that the applying means is coupled to a "bicomponent fiber source containing said bicomponent fibers." It is submitted that this is not a recitation of the

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manner in which the claimed system is intended for use, but rather an affirmative structural limitation.

In the rejection, the Examiner identifies component 80 of Young as being a source of bicomponent fibers. Reference 80 identifies a supply housing for solid particulate described as "super absorbent particles," not bicomponent fibers. Column 18, Lines 20-21.

Wood pulp fibers are provided to hopper 116 from conduit 114, and separate "treated fibers" (i.e., batch fibers 16 treated with a binder) are provided from hopper 110. These fibers are mixed in "conventional fiber blending unit 112." (Column 20, Lines 32-34). The wood pulp fibers and treated fibers are not bicomponent fibers as understood in the art and thus do not come from a bicomponent fiber source containing bicomponent fibers.

Therefore, it is submitted that Claim 20 is not anticipated by Young and is, therefore, allowable. Claims 21-25 depend from Claim 20 and are, therefore, also not anticipated by Young. Reconsideration and withdrawal of the rejection of Claims 20-25 as being anticipated by Young are respectfully requested.

Independent claim 29 also recites that its depositing means is coupled to a bicomponent fiber source containing said bicomponent fibers. For reason analogous to those argued above in connection with claim 20, it is submitted that claim 29 and dependent claims 30-34 and 37 are not anticipated by Young and are allowable thereover.

Independent claim 38 also recites that system includes a source containing bicomponent fibers coupled to its deposition chamber. For reason analogous to those argued above in connection with claims 20 and 29, it is submitted that claim 38 and dependent claims 39-41 and 43 are not anticipated by Young and are allowable thereover.

2. Francis

The Action rejects Claims 20-27 and 29-43 as being anticipated by U.S. Patent No. 2,543,101 to Francis. The Examiner identifies blowers 15 and 17 as the source of bicomponent

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fibers. Independent Claims 20, 29 and 38 each recite that the system includes a source (or bicomponent fiber source) containing bicomponent fibers. Neither blower 15 nor blower 17 contain bicomponent fibers.

“Potentially adhesive fibers” formed in chamber 10 are provided by blower 15 and “non-adhesive fibers” are provided by blower 17 to chamber 9, where they are “scattered about” and “mixed together before settling out.” (Column 8, Line 71-Column 9, Line 5). Neither of these fibers are described by Francis as being bicomponent fibers. Therefore, neither blower 15 nor blower 17 is a source containing bicomponent fibers. For at least this reason, it is submitted that independent Claims 20, 29 and 38 are not anticipated by and are allowable over Francis. Claims 21-27, 30-37 and 39-43 depend from Claims 20, 29 and 38, respectively, and are, therefore, also allowable. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

Still further, it is submitted that dependent claims 26, 35 and 42 are independently allowable over Francis. Claims 35 and 42 originally recited, and claim 26 has been amended to recite, that the hose which couples the deposition chamber to the blower is oriented at an upward orientation toward the top wall of the chamber. As explained in Paragraph 28 of the application, this feature directs the blown stream towards the top of the chamber, which in embodiments includes a filter (See Claims 27, 36) that allows air but not fibers to escape. Created turbulence disperses the fibers, which then deposit evenly on the conveyed insulation mat. The hoses of Francis are clearly not oriented at an upward orientation toward the top wall of the chamber. Specifically, hoses 14 and 16 are oriented parallel to the top wall of the chamber and face one another. This creates a strong flow path orthogonal to the chamber walls and parallel to the chamber top wall. Though some of the fibers are present near the top end of the chamber 9, these fibers must pass through this orthogonal air flow in order to settle to the bottom of the chamber. It is submitted that such a configuration makes it difficult to control the consistency of the sedimentation process. It is submitted that the claimed orientation materially distinguishes

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the claims from Francis. Therefore, it is submitted that these claims are not anticipated by Francis and are independently allowable thereover.

C. Claim Rejection under 35 U.S.C. § 103

The Action rejects Claim 28 as being obvious from Young in view of U.S. Patent No. 2,744,045 to Collins and as being obvious from Francis in view of Collins.

Claim 28 depends from Claim 20, which is allowable as set forth above, and is, therefore, also allowable. Reconsideration and withdrawal of the rejections of Claim 28 are respectfully requested.

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[I-8846]**IV. Conclusion**

In view of the foregoing remarks and amendments, Applicants submit that this application is in condition for allowance at an early date, which action is earnestly solicited.

The Commissioner for Patents is hereby authorized to charge any additional fees or credit any excess payment that may be associated with this communication to deposit account **04-1679**.

Respectfully submitted,

Dated: 10/6/06


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